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5 *Attorney for Defendants*

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8 **UNITED STATES DISTRICT COURT**  
9 **EASTERN DISTRICT OF CALIFORNIA**

10 JOHN ERIC PARTANEN, an individual,  
11  
12 Plaintiff,  
13  
14 v.  
15 WESTERN UNITED STATES PIPE BAND  
ASSOCIATION, a Nevada Corporation, and  
16 JEFF MANN, an individual,  
17  
18 Defendants.

**CASE NO.: 1:21-cv-00588-NONE-BAM**

**STIPULATION AND [PROPOSED]  
ORDER EXTENDING DEADLINE FOR  
DEFENDANTS TO RESPOND TO  
PLAINTIFF'S PENDING MOTIONS  
[Second Request]**

18 Plaintiff John Eric Partanen ("Plaintiff" or "Partanen") and Defendants Western United States  
19 Pipe Band Association and Jeff Mann (collectively, when possible, "Defendants"), by and through  
20 their respective counsel, hereby submit the following Stipulation and [Proposed] Order to Extend  
21 Deadline for Defendants to Respond to Plaintiff's pending motions. The Parties previously stipulated  
22 to extend the deadline for Defendants to respond to four motions Plaintiff had pending. Defendants  
23 intend to respond by the deadline of August 27, 2021 to: (1) the motion to declare void a voidable  
24 bilateral agreement [ECF No. 41]; and (2) motion to compel binding arbitration [ECF No. 39].

25 However, the other two pending motions may be the subject of a Rule 11 motion.  
26 Specifically, the (3) motion for equitable relief [ECF No. 40]; and (4) motion to compel WUSPBA  
27 to comply with its contest rules [ECF No. 38]. The Parties are in the process of determining whether  
28 Plaintiff will elect to withdraw those motions or not. To account for the twenty-one (21) day safe

harbor provision contained within FRCP 11(c)(2) the Parties are stipulating to an extension for Defendants the deadline to oppose those motions. ECF No. 38, ECF No. 40.

This request is made in good faith, is not made for the purpose of delay, and will not result in any undue delay or prejudice. Accordingly, the Parties have agreed and stipulate that the deadline for Defendants to respond to the pending motions will be on or before **September 22, 2021**.

RESPECTFULLY SUBMITTED,

DATED this \_\_\_\_<sup>th</sup> day of August, 2021.

DATED this \_\_\_\_<sup>th</sup> day of August, 2021.

BY: [Signature Provided at Doc. No. 50]

BY: [Signature Provided at Doc. No. 50]

JOHN ERIC PARTANEN

*Plaintiff In Pro Se*

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*Attorneys for Defendants*

### ORDER

For the reasons articulated in the above stipulation, the deadline for defendants to respond to the pending motions will be on or before **September 22, 2021**.

IT IS SO ORDERED.

Dated: **August 27, 2021**

  
UNITED STATES DISTRICT JUDGE